

Pacific Packet Radio Society

Vol. I - No. 5

NEWSLETTER

June 1985

de KE6ZE

21 May 1985

Our growth rate has slowed down. PPRS is now at 95 memberships an additional ten over last month. The board is now thinking of closing charter memberships, and changing the yearly rate to \$15 per year. We have to work out how we are going to do this. We can't cut short those who just joined and having memberships expire at different times of the year creates book keeping nightmares. So, stay tuned and if you have any thoughts on the matter bring them up at the general meeting.

One of the important things we can do as an organization is provide info to newcomers to packet radio. Of the several ideas put forward, the one seeming to have the most merit is to make available (at the radio outlets in northern Calif -- HRO, Quement's, Heathkit etc.) information on packet radio in our area. This would take the form of a single handout sheet with information about area repeaters, the mail box and about ourselves. Hopefully these outlets will make these sheets available to their customers and we can look forward to seeing new calls on our systems. The fly in the ointment here is: we haven't enough funds to financially support such an idea. Our dues will pay for this newsletter and provide a small cushion for year-end roll over while we wait for renewals.

We need some type of a fund raiser idea/activity. One thing we are going to try is to provide coffee at the meetings for a fee and provide cookies instead of doughnuts. The doughnuts were at best a break even affair. Other ideas are T-shirts, PROM programming for TAPR (& clones) to allow users to get a copy of the latest software. Unfortunately most ideas produce little bucks for the bang. For instance at \$5 per PROM set and 10 customers per meeting nets \$50. Not too much when you consider the work involved. So, if you have any ideas bring them up at the meeting. But, don't bring it up if you are not willing to work on it. Ideas we have lots of, workers not so many.

Field day this year is 1100 PDT 22 June to 1300 PDT 23 June. The rules have been changed to allow a "free" packet radio station and three digipeater hops. Get on and give out contacts or better yet, go set up a station at somebodys field day site to help them out.

Elsewhere in this newsletter is a copy of the NPRM allowing automatic control of radio stations above 29.5 MHz. Please read the notice and file comments. The rule making specifically disallows third party traffic in the case of automatic control. When you forward a message for another ham, that is third party traffic. A strict interpretation says that digipeaters handle third party traffic. A realistic proposal would place the burden for control of third party on the originating station, not the intermediate stations. It may be that common carrier (telephone) general access to an automatic station may be the point to control. But, all this is my opinion read it yourself and make a comment. In order to make it easy there is also a guide line on how to reply included in this issue.

***** MEETING NOTICE *****

7:30 PM @ Ampex cafeteria 4 June 1984.

MEETING TIMES HAVE BEEN CHANGED FROM 8:00 TO 7:30, 1/2 HOUR EARLIER.
At the meetings we will try to conduct organization business and guest speaker by 8:45 to 9:00 then have group meetings after a break.

73, Dave Engle, KE6ZE

Before the
Federal Communications Commission
Washington, D.C. 20554

PR
FCC 85-169
35723

In the Matter of
Amendment of Part 97 of the
Commission's Rules to permit
automatic control of amateur radio
stations.

) PR Docket No. 85-105
) RM-4879

NOTICE OF PROPOSED RULE MAKING

Adopted: April 5, 1985

Released: April 11, 1985

By the Commission:

1. Notice of Proposed Rule Making in the above-captioned matter is
hereby given.

2. The Commission has received a petition (RM-4879) from the American Radio Relay League, Inc., (ARRL) seeking to amend the Amateur Radio Service Rules to permit automatic control of digital communications on all amateur frequencies above 30 MHz.^{2/} The ARRL notes that Part 97 currently contains provisions for automatic control of stations in repeater, auxiliary and beacon communications. In support of its petition, the ARRL states that a variety of digital codes, such as radioteleprinter, transfer of computer programs, direct computer-to-computer communications and "packet switching" systems lend themselves to a mode of amateur radio transmission where a control operator need not be present. According to the ARRL, present microprocessor and computer technology now routinely present at amateur stations can automatically transmit and receive digital communications, verify receipt of messages and respond to inquiries. The ARRL notes that the use of Computer Based Message Systems (CBMS) are something new in amateur communications and should be encouraged by more experimentation, including automatic control which is both feasible and necessary to facilitate further development in the art of amateur radio. Two timely comments were filed. Both supported the petition for rule making.

3. Automatic control in the Amateur Radio Service has previously been approved for repeater, auxiliary links and beacon operations.^{2/} With an ever-growing list of amateur operations where automatic control is permitted, we believe that now may be the appropriate time to expand automatic control to all amateur operations, prohibiting its use only in those situations where there is a justifiable reason why automatic control should not be allowed. Therefore, we invite amateur radio operators in general, and amateurs experienced in automatic control in particular, to submit comments calling to our attention any problems that may arise by expanding automatic control to encompass all amateur radio operations. Our goal is to keep the amateur service abreast of technological developments and to utilize new technology, such as CBMS, where appropriate. On the other hand, we do not want to introduce any innovations into the service which would be disruptive of amateur communications or which would essentially change the character of the service.

^{2/} The ARRL said that it was not requesting automatic control for frequencies below 30 MHz (HF frequencies) because heavy frequency usage below 30 MHz made manual control of digital communications on those frequencies more appropriate.

^{2/} For automatic control of stations in repeater and auxiliary operation, see Report and Order in Docket No. 20112, adopted June 11, 1975; FCC 75-706; 40 FR 26524, June 24, 1975. For automatic control of beacon operations, see Report and Order in PR Docket No. 81-823, adopted October 21, 1982; FCC 82-455; 47 FR 50702, November 9, 1982.

4. We propose that any amateur radio station may be under automatic control, except when transmitting on frequencies below 29.5 MHz. As noted earlier, the petitioner did not request automatic control below 30 MHz. However, since automatic control is already permitted for repeater operation between 29.5-29.7 MHz, it is reasonable to make the lower limit for automatic control 29.5 MHz, rather than 30 MHz.

5. These proposed rule amendments would still prohibit automatic control operation in any instance where the station is transmitting third-party traffic. This is in accord with Section 97.79 (d) of the amateur rules which specifies that a control operator must always be present when a third party is participating in amateur radio communications.^{3/}

6. For purposes of this non-restricted notice and comment rule making proceeding, members of the public are advised that ex parte contacts are permitted from the time the Commission adopts a Notice of Proposed Rule Making until the time a public notice is issued stating that a substantive disposition of the matter is to be considered at a forthcoming meeting. In general, an ex parte presentation is any written or oral communication (other than formal) written comments/pleadings and formal oral arguments) between a person outside the Commission and a Commissioner or a member of the Commission's staff which addresses the merits of the proceeding. Any person who submits a written ex parte presentation must serve a copy of that presentation on the Commission's Secretary for inclusion in the public file. Any person who makes an oral ex parte presentation, addressing matters not fully covered in any previously-filmed comments in the proceeding, must prepare a written summary of that presentation; on the day of the oral presentation, that written summary must be served on the Commission's Secretary for inclusion in the public file, with a copy to the Commission official receiving the oral presentation. Each ex parte presentation must also state by docket number the proceeding to which it relates. See generally, Section 1.1231 of the Commission's Rules, 47 CFR 1.1231. A summary of the Commission's procedures governing ex parte contacts in informal rule makings is available from the Commission's Consumer Assistance Office, FCC, Washington, D.C. 20554, (202) 632-0000.

7. Authority for issuance of this Notice is contained in Sections 4(i) and (303)(g) and (r) of the Communications Act of 1934, as amended, 47 U.S.C. 154(1) and (303)(g) and (r). Pursuant to applicable procedures set forth in Section 1.415, 47 CFR 1.415, of the Commission's Rules, interested persons may file comments on or before June 25, 1985, and reply comments on or before July 25, 1985. All relevant and timely comments will be considered by the Commission before final action is taken in this proceeding. In reaching its decision, the Commission may take into consideration information and ideas not contained in the comments, provided that such information or a writing indicating the nature and source of such information is placed in the public file, and provided further that the fact of the Commission's reliance on such information is noted in the Report and Order.

8. In accordance with Section 1.419 of the Commission's Rules, 47 CFR 1.419, formal participants must file an original and five copies of their comments and other materials. Participants who wish each Commissioner to have a personal copy of their comments should file an original and eleven copies. Members of the general public who wish to express their interest by participating informally may do so by submitting one copy. All comments are given the same consideration, regardless of the number of copies submitted. Each set of comments must state on its face the proceeding to which it relates (PR Docket Number) and should be submitted to: The Secretary, Federal Communications Commission, Washington, D.C. 20554. All documents will be available for public inspection during regular business hours in the Commission's Public Reference Room at its headquarters in Washington, D.C.

9. In accordance with Section 605 of the Regulatory Flexibility Act of 1980 (5 U.S.C. 605), the Commission certifies that these rules would not, if promulgated, have a significant economic impact on a substantial number of small entities because these entities may not use the Amateur Radio Service for commercial radiocommunication (see 47 CFR 97.3 (b)). In addition, the proposed rules concerning expansion of automatic control in the Amateur Radio Service would not significantly impact on the manufacturers of amateur radio equipment since devices installed to secure the radio equipment from unauthorized use or to detect transmitter malfunction are not usually purchased from such manufacturers.

10. In view of the foregoing, rule making petition RM-4879 filed by the ARRL IS GRANTED.

11. IT IS ORDERED, That the Secretary shall cause a copy of this Notice to be served upon the Chief Counsel for Advocacy of the Small Business Administration and the Secretary shall also cause a copy of this Notice to be published in the Federal Register.

12. For information concerning this proceeding, contact Maurice J. DePont, Federal Communications Commission, Private Radio Bureau, Washington, D.C. 20554, (202) 632-4964.

FEDERAL COMMUNICATIONS COMMISSION

William J. Tricarico
Secretary

APPENDIX

Part 97 of Chapter I of Title 47 of the Code of Federal Regulations would be amended, as follows:

1. Section 97.3 (m) (3) would be amended to read:

§ 97.3 Definitions.

* * *

(m) * * *

(1) * * *

(2) * * *

(3)

Automatic control means the use of devices and procedures for control of an amateur station without the control operator being present at the control point.

2. Section 97.79 (b) would be amended to read:

§ 97.79 Control operator requirements.

* * *

(b) Every amateur radio station, when transmitting, must have a control operator. The control operator must be present at the control point of the station, except when the station is transmitting under automatic control. The control operator must be a licensed amateur radio operator or permittee designated by the station licensee. The control operator and the station licensee are both responsible for the proper operation of the station. For purposes of enforcement of the rules of this part, the FCC will presume that the station licensee is the control operator of the station, unless documentation exists to the contrary.

3

(d) Third-party traffic from any amateur radio station under automatic control.

4. A new section 97.80 would be added, as follows:

§ 97.80 Operation under automatic control.

(1) An amateur radio station may be operated under automatic control:

(a) when in beacon operation on frequencies 28.20-28.30 MHz; and

(2) when transmitting on frequencies above 29.5 MHz, except when in beacon operation on:

<u>MHz</u>
50.00-50.06
50.08-54.0
144.00-144.05
144.06-148.00
220.00-220.05

(b) When under automatic control, devices must be installed and procedures must be implemented which will ensure compliance with the rules when the control operator is not present at the control point of the station.

(c) No amateur radio station may be operated under automatic control while transmitting third-party traffic.

(d) Automatic control of a station must cease upon notification by the Engineer-in-Charge of a Commission field office that the station is transmitting improperly or causing harmful interference to other stations. Automatic operation must not be resumed without prior approval of the Engineer-in-Charge.

5. Section 97.85 (e) would be deleted. Paragraphs (f), (g) and (h) would be redesignated as paragraphs (e), (f) and (g), respectively.

6. Section 97.86 (a) would be deleted. Paragraphs (b), (c) and (d) would be redesignated as paragraphs (a), (b) and (c), respectively.

7. Section 97.87 (b) and (c) would be deleted. Paragraph (d) would be redesignated as paragraph (b) and paragraph (e) would be redesignated as paragraph (c). In redesignated paragraph (b), the last sentence would be amended to read: "In such cases, the rules of 97.85 (e) (1) (2) and (3) apply." A new paragraph (d) would be added to Section 97.87 to read, as follows:

(d) Beacons under automatic control transmitting below 432.08 MHz are restricted to the following emissions: NPN, AIA, F1B and J2A.

8. Section 97.114 would be amended by adding a new paragraph (d) as follows:

§ 97.114 Limitations on third-party traffic.

* * *

(d) Third-party traffic from any amateur radio station under automatic control.

FROM THE EDITOR

It is perhaps fortunate that we do not have a pile of articles waiting to be published in this month's NEWSLETTER since the FCC has a closing date of June 25 for Comments to PR Docket 85-105 which you will find reprinted in its entirety in this issue. The ARRL submitted a Petition to the FCC in the Fall of 1984 and the enclosed NPRM is the result of that petition. Since I was one of the two persons to file "timely comments" I am going to take some space here in hopes that I can get you to file your own comments to the Docket at a time when it will really have an impact.

The ARRL made no mention of restrictions to third party traffic in its original Petition. The Staff at the FCC took it upon themselves to insert this restriction obviously in the fear that the amateur community would have no means to prevent digital communications from being infiltrated by non-licensed persons. It is pretty obvious to me that FCC has not yet begun to understand what Packet Radio is about for if they did, they would understand that we have better control over access to Packet Radio transmissions than we do, say, over two-meter FM duplex repeaters. For example, each Packet Radio transmission includes in its header the callsigns of both the originating and destination stations as well as the intermediate digital repeaters which provide the communications link.

What better way to control communications than to require station identification on each transmission? It is done so effortlessly in Packet Radio that the FCC probably has given no thought to the fact that such procedures would virtually insure that licensed stations are in control of the automatic digital repeater.

What disadvantage will come to Packet Radio if third party traffic is excluded from automatic control? First of all, there will be no legal transmissions of NTS traffic and Packet Radio will go the way RTTY did when it was proposed as a facility for use by the National Traffic System. It is true that RTTY is used by certain regional and local nets but the bulk of NTS traffic is still handled by cw ops in the time-honored tradition. There's nothing wrong with that - please don't get me wrong as I really enjoy cw - but cw limits the amount of traffic that can be handled. Packet Radio on the other hand, would greatly expand NTS capacity especially since it is virtually error-free. Second, any restriction on third party traffic eliminates the bulletin boards and mailboxes since much of the traffic in these systems is third party in nature.

If you will, think back to the days when FM repeaters were first coming on the scene. FCC Rules required a Control Operator to monitor and control all communication via these systems. It took about a dozen years to replace the old rules so that FM repeaters could operate without the presence of a permanent Control Operator. If the present NPMR is adopted and becomes a Rule, we can expect it to take about that long for digital repeaters to be permitted to carry third party traffic.

The FCC is not in the habit of changing Rules on the spur of the moment. Any rule made today would require a minimum of 2 years to change, along with a great deal of support from the amateur community. Please do your best to file a LOGICAL set of Comments to the Docket. Dave has provided an example of how comments should be filed. If you wish each Commissioner to have a copy to read then you have to file a total of 11 copies. I intend to inform the Commission that I think that the amateur community can police itself in this endeavor. I will try to point out that Packet Radio is a very different mode from the more commonly used means of Amateur communication in that each packet transmission includes proper identifications and acknowledgement of transmitted data as to its origin and accuracy. The FCC needs to allow third party traffic under the control of properly licensed amateurs in order to promote the state of the art of Packet Radio. Restrictions to third party traffic handling will have an undesired effect on the development of one of the most innovative forms of communications to be employed by amateurs in over 20 years.

So, get on with it and file your comments. By the way, letters are virtually ignored, so if you want to have an impact, you have to do it their way!

Rich Collins, NT6V, Editor

NORTH COAST PACKET RADIO GROUP MEETING

The next regular meeting of the North Coast Packet Radio Group will be held at the Ampex Cafeteria, in Redwood City, CA, Tuesday, June 4, 1985 at 7:30 PM. Please note the earlier time. It is hoped that extra time will allow group discussions to take place. The featured presentation is the demonstration of TAPR's "TNC 2," the newest development from TAPR which was announced via video tape at our last meeting. Lyle Johnson WA7GXD reports that the price of the new kit will be \$185 including the case, and that it will operate from your standard 13 vdc supply.

To reach the Ampex Cafeteria from Highway 101 southbound, take the Woodsid Road Exit and turn left at the first traffic light. Go south on Broadway for approximately one mile where you will see the Ampex Cafeteria, a building located next to a fountain-and-pool area, on your right. Parking is available on both sides of Broadway.

PPRS MONTHLY MEETING

The next regular meeting of the Pacific Packet Radio Society will be held at the Ampex Cafeteria, in Redwood City, CA, Tuesday, June 11, at 8:00 PM. Please note the earlier time. It is hoped that extra time will allow group discussions to take place. The featured presentation is the demonstration of TAPR's "TNC 2," the newest development from TAPR which was announced via video tape at our last meeting. Lyle Johnson WA7GXD reports that the price of the new kit will be \$185 including the case, and that it will operate from your standard 13 vdc supply.

Stu Carson, K4GERF in Napa is trying to establish a National Directory of Packet Stations. Please send your data to him and include information as to location and callsign as well as operating times.

PACKET DIRECTORY

K6VC0-2 HAS MOVED

Stu Nebblett's packet repeater has moved from its original frequency to the mailbox frequency, 145.09 MHz. The repeater is located in Oakland at the home of Woody Teague WA6TAT and it operates 24 hours a day.

HOW TO PREPARE COMMENTS FOR THE F.C.C.

Comments to the FCC should be on 8 1/2 by 11 inch paper with the left-hand and top margins being at least 1 1/2 inches and at least one inch on the right side and bottom of the page. Use one side of the paper only and double-space your comments, except for long quotations, which may be single spaced. All papers shall be typewritten. Number your paragraphs and in your comments, refer to the docket paragraph number or rules Part number that you are commenting on.

Be polite and don't insult the Commission. Don't say "don't do" something unless you have an alternative to offer, or can list reasons why it should not be done.

Mail the original and 5 copies to:

Federal Communications Commission
Mr. William Tricarico, Secretary
1919 M. Street, NW.
Washington, D.C. 20554

The top of the first page should be headed as in the following example:

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
Amendment of Part 97 of the) PR Docket No. 85-105
Commission's Rule to permit) RM-4879
automatic control of)
amateur radio stations)

COMMENTS

(Start your comments about 5 lines down)

Sign and date the comments at the end of the last page:

Respectfully submitted

(Your signature) (date)

Johnny L. Jones, WE6ABC
123 N. Pole Street
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